

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

*Newport News Division*



IN RE: ROBERT CHAMBERS, JR., et al.  
GRAND JURY PROCEEDINGS

)

CASE NUMBER 4:25-cr-

)

UNDER SEAL

**MOTION TO SEAL INDICTMENT**

The United States of America, by and through its attorneys, Erik S. Siebert, United States Attorney for the Eastern District of Virginia, and Peter G Osyf, Assistant United States Attorney, pursuant to Local Criminal Rule 49(B) moves to seal the indictment and arrest warrants in this case.

Sealing is necessary to avoid notification of the existence of the arrest warrants which could result in flight from prosecution, the destruction of or tampering with evidence, the intimidation of potential witnesses, jeopardize the safety of the arresting officers or otherwise jeopardize the ongoing investigation. Another procedure will not adequately protect the needs of law enforcement at this time.

Such sealing is within the discretion of this Court and may be granted “for any legitimate prosecutorial need.” *United States v. Ramey*, 791 F.2d 317, 321 (4th Cir. 1986); *see also*, *Baltimore Sun Co. v. Goetz*, 886 F.2d 60, 65 (4th Cir. 1989).

The United States requests that the indictment and arrest warrants remain under seal until the initial appearance of the defendants, at which time the indictment may be treated as a matter of public record.

Respectfully submitted,

ERIK S. SIEBERT  
UNITED STATES ATTORNEY

A handwritten signature in blue ink, appearing to read "Peter G. Osyf", written over a horizontal line.

Peter G. Osyf  
Assistant United States Attorney  
11815 Fountain Way, Suite 200  
Newport News, VA 23606  
(757) 591-4000